

PRIVILEGE LOG		
RECORD	DESCRIPTION	OBJECTION
Attorney notes/statistical information:	1 Page of Assistant State's Attorney Brenda Karales's ("ASA") notes taken contemporaneously with the Victim Sensitive Interview of J.P. on July 9, 2018, at the Kendall County Child Advocacy Center. The notes were taken in anticipation of potential criminal charges and consist of only a handful of words identifying the ASA mental impressions and conclusions regarding the VSI. The notes include statistical information for Children's Advocacy Center record keeping, including the gender, age, and race of the minor child, as well as the police agency involved.	We object to the disclosure of this single page because it is protected attorney work-product in that it contains the mental impressions, opinions and conclusions of the attorney. Attorney work-product is generally prohibited from disclosure unless the requesting party established a "substantial need" for the material, and demonstrates the inability to obtain equivalent information without "undue hardship." <i>Sandra T.E. v. S. Berwyn Sch. Dist.</i> , 600 F.3d. 612, 622 (7th Cir. 2009) (Citing Fed. R. Civ. P. 26(b)(3)(A)(ii)). Moreover, notes relating to witness interviews are "particularly discouraged" because they are likely to reveal the attorney's thought process. <i>Id.</i> (citing <i>Upjohn Co. v. United States</i> , 449 U.S. 383, 398-99).